

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
and the STATE OF MISSISSIPPI,)	
)	
Plaintiffs,)	
)	Case No. 3:12-cv-790-HTW-LGI
)	(Clean Water Act Case)
v.)	
)	
)	
THE CITY OF JACKSON, MISSISSIPPI,)	
)	
Defendant.)	
)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 3:22-cv-00686-HTW-LGI
)	(Safe Drinking Water Act Case)
v.)	
)	
)	
THE CITY OF JACKSON, MISSISSIPPI,)	
)	
Defendant.)	
)	

**JXN WATER, INC.'S MOTION FOR ENTRY OF ORDER
APPROVING QUARTERLY STATUS REPORTS**

JXN Water, Inc., through counsel for the Interim Third-Party Manager (the “ITPM”), moves the Court to enter an order approving all Status Reports submitted pursuant to Paragraph

16.a of the Interim Stipulated Order on the Water System in the Safe Drinking Water Act Case and 17.a of the Stipulated Order on Sewer System in the Clean Water Act Case.¹

1. Paragraph 16.a of the Stipulated Order and 17.a of the Stipulated Order require the ITPM to submit written Status Reports on his progress in implementing the Orders to the parties to this action and the Court, commencing with the first Quarter after the Effective Date and continuing Quarterly until termination of the Orders pursuant to the termination clauses (Section VII - Safe Drinking Water Act Case and Section VIII - Clean Water Act Case).

2. The ITPM has submitted the following Status Reports in the Safe Drinking Water Act Case, containing all required information pursuant to the Interim Stipulated Order, Paragraph 16.a:

- Docket No. 41 – STATUS REPORT for the Quarter Ending on June 30, 2023, entered August 1, 2023.
- Docket. No. 47 – STATUS REPORT for the Quarter Ending on September 30, 2023, entered October 27, 2023.
- Docket No. 51 – STATUS REPORT for the Quarter Ending on December 30, 2023, entered January 31, 2024.
- Docket No. 53 – STATUS REPORT for the Quarter Ending on March 31, 2024, entered April 30, 2024.
- Docket No. 54 – STATUS REPORT for the Quarter Ending on June 30, 2024, entered August 1, 2024.

3. The ITPM has submitted the following Status Reports in the Clean Water Act Case, containing all required information pursuant to the Stipulated Order, Paragraph 17.a:

- Docket. No. 86 – STATUS REPORT for the Quarter Ending on December 30, 2023, entered January 31, 2024.

¹ Due to the brevity of this Motion, JXN Water asks that the Court waive the requirement of L.U. Civ. R. 7(b)(4) to file a separate memorandum in support.

- Docket. No. 110 – STATUS REPORT for the Quarter Ending on March 31, 2024, entered April 30, 2024.
- Docket. No. 141 – STATUS REPORT for the Quarter Ending on June 30, 2024, entered August 1, 2024.

WHEREFORE, PREMISES CONSIDERED, JXN Water respectfully requests this Court enter an order approving all Status Reports filed in the Safe Drinking Water Act Case and Clean Water Act Case, including the reports listed above.

Respectfully submitted this the 6th day of August, 2024.

/s/ Malissa Wilson

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